ND-2016-12-E
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CRS center for resource solutions

February 12, 2019

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PSC SC
CLERK'S OFFICE

Jocelyn G. Boyd
Chief Clerk/Administrator
101 Executive Center Dr., Suite 100
Columbia, SC 29201

Dear Jocelyn G. Boyd,

I am writing to provide information that may be of relevance to your department's metrics on Greenhouse Gas (GHG) emissions, renewable electricity penetration or renewable electricity delivery in your state.

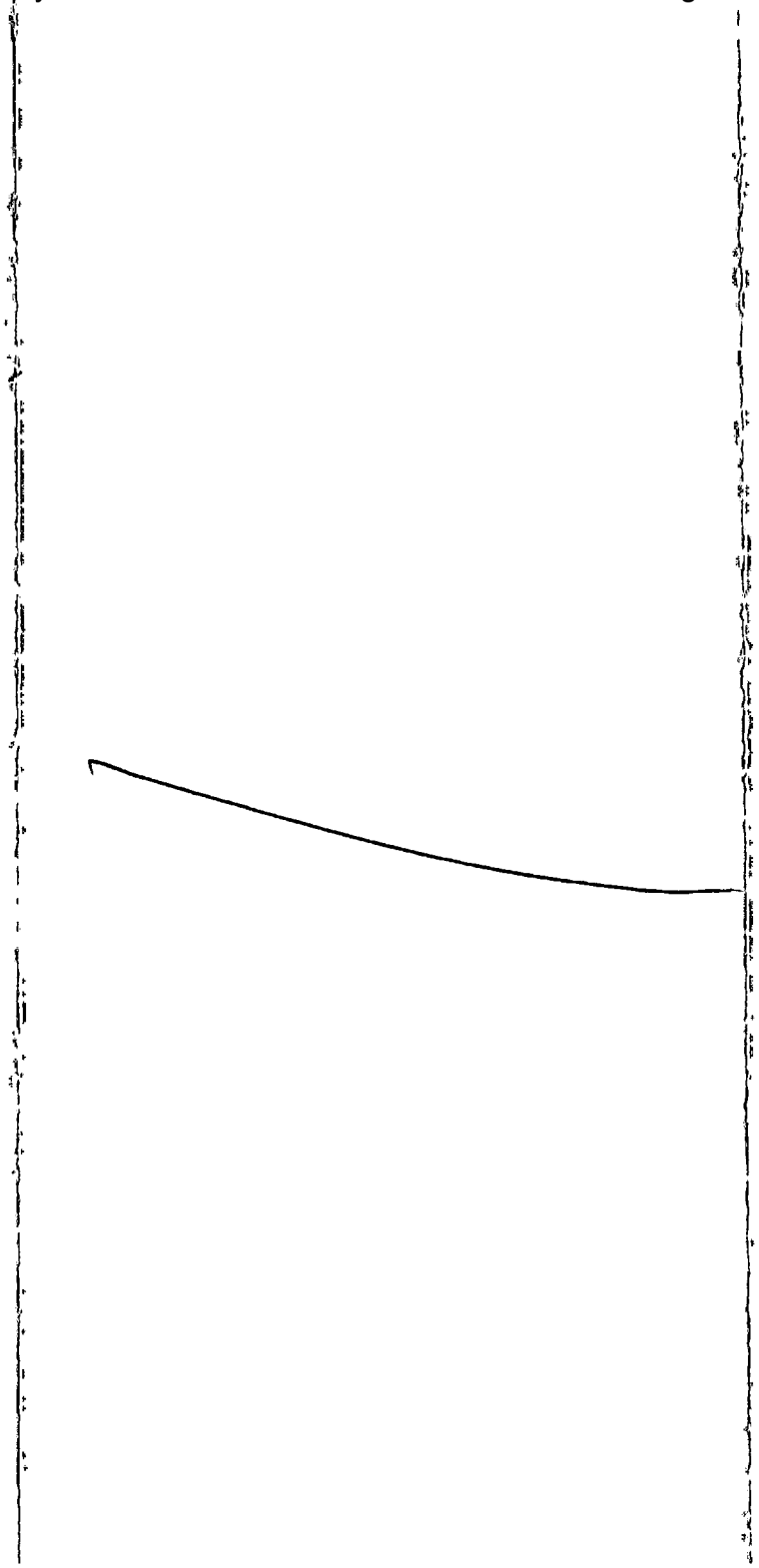
I manage the Green-e Energy certification program, which is a consumer protection program that certifies sales of Renewable Energy Certificates (RECs)[2] and renewable electricity (collectively called "renewable MWh" for the purposes of this letter). Electricity users can purchase certified renewable MWh in order to voluntarily use more renewable electricity than they would otherwise receive through their electric utility service. Green-e Energy collects data on such voluntary renewable MWh purchases, and we are providing data to you to ensure that voluntarily-purchased renewables are not counted toward your state's Renewable Portfolio Standard, GHG reporting goals, or another conflicting obligation related to emissions or renewable electricity.

This letter serves to help you prevent double counting of renewable MWh by informing you of the quantity of electricity, which has been stripped of its RECs, that is generated or purchased by certain utilities. Electricity that is generated by a renewable electricity facility and has been separated from the RECs generated with it cannot be considered renewable electricity, because *RECs are the means to identify and claim which resource was used to generate renewable electricity*. Such electricity is commonly called "null power," and is typically treated as if it were power from the spot market because it cannot be linked back to a particular generation facility or resource type.

Utilities delivering this electricity without its RECs should not be allowed to count this electricity toward any state Renewable Portfolio Standards, mandates, disclosures of electricity delivered to customers that identify the generator's resource type, or the like; otherwise the RECs are considered double counted and are ineligible for separate sale. Similarly, when calculating emissions from electricity consumed in the state, electricity stripped of RECs should not be considered zero or low-emissions.

[2] RECs are tradable commodities that are used to track and allocate the use of renewable electricity in the US. RECs represent the environmental attributes of 1 MWh of electricity generated from a renewable resource, including the fact that the electricity produced low or no CO_2 emissions.

1012 torney avenue tel 415.561.2100



See the details below for the quantity and generation period of RECs sold separately from electricity that was generated or purchased by utilities in your state. Each utility's oversight body is being contacted with this information as well.

Transaction Details for Sales made in 2017

Generation Facility Name	Number of RECs (MWh) Sold Separately from Electricity	Generation Facility State	Renewable Resource Type	Period of Generation (Quarter/Year or Month/Year)	Null Power Purchaser in your State
Town of Warsaw	348	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
TWE New Bern Solar Project, LLC	5214	NC	Solar	1/2017, 10/2016, 11/2016, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 8/2016, 9/2016	Duke Energy Progress
West Siler Farm Llc	4923	NC	Solar	1/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Bearford Farm Solar Project	4702	NC	Solar	2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Bunn Level	2937	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Cohen Farm Solar	7185	NC	Solar	1/2017, 10/2016, 11/2016, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 8/2016, 9/2016	Duke Energy Progress
Deep Branch Project	341	NC	Solar	1/2017, 6/2017	Duke Energy Progress
Delco	2712	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Exum Solar Farm	4908	NC	Solar	1/2017, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Floyd Solar, LLC	1850	NC	Solar	5/2017, 6/2017, 7/2016	Duke Energy Progress
Franklinton Solar	2650	NC	Solar	3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress

Hector Farm Project	5228	NC	Solar	1/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Innovative Solar 65	4237	NC	Solar	1/2017, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Kennedy Solar	1027	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Kojak	2810	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Lanier Solar, LLC	7986	NC	Solar	1/2017, 10/2016, 11/2016, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 8/2016, 9/2016	Duke Energy Progress
Maxton Solar 1	38	NC	Solar	9/2016	Duke Energy Progress
Meriwether	2589	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Mills Anson	2756	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Old Wire	3139	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Pollocksville Solar	491	NC	Solar	1/2017, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
South Louisburg, LLC	7196	NC	Solar	1/2017, 10/2016, 11/2016, 12/2016, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 8/2016, 9/2016	Duke Energy Progress
Southerland	2795	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Spring Valley Farm 2	4237	NC	Solar	2/2017, 3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
St. Pauls Solar	3252	NC	Solar	3/2017, 4/2017, 5/2017, 6/2017	Duke Energy Progress
Stone	3004	NC	Solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Tart	2479	NC	solar	4/2017, 5/2017, 6/2017	Duke Energy Progress
Maiden PV1 - 1	7776	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017,	Duke Energy Carolinas, LLC

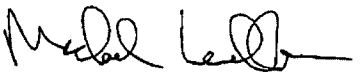
				2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	
Maiden PV1 - 2	5916	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Maiden PV1 - 3	8023	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Maiden PV1 - 4	5949	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Maiden PV1 - 5	5984	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Maiden PV1 - 6	5931	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Conover PV2 - DEL1	19611	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Conover PV2 - DEL2	19839	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC

Claremont PV3 - DEL1	18748	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Claremont PV3 - DEL2	17629	NC	Solar	1/2017, 10/2017, 11/2017, 12/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
10MW fuel cell electric generating facility	71161	NC	Gaseous Biomass	1/2017, 10/2017, 11/2017, 2/2017, 3/2017, 4/2017, 5/2017, 6/2017, 7/2017, 8/2017, 9/2017	Duke Energy Carolinas, LLC
Choco Solar	35	NC	Solar	7/2017	Duke Energy Progress
Moffett Solar 1	2631	SC	Solar	12/2017	South Carolina Electric&Gas Company
Floyd Solar, LLC	4886	NC	Solar	10/2017, 11/2017, 12/2017, 7/2017, 8/2017, 9/2017	Duke Energy Progress
Lanier Solar, LLC	4731	NC	Solar	10/2017, 11/2017, 12/2017, 7/2017, 8/2017, 9/2017	Duke Energy Progress
Maxton Solar 1	2172	NC	Solar	10/2017, 11/2017, 12/2017	Duke Energy Progress
TWE New Bern Solar Project, LLC	669	NC	Solar	7/2017	Duke Energy Progress
South Louisburg, LLC	1670	NC	Solar	7/2017, 8/2017	Duke Energy Progress
Cohen Farm Solar	921	NC	Solar	8/2017	Duke Energy Progress
Domtar Marlboro Mill Biomass Power Plant	226204	SC	Non-gaseous Biomass	Q1/2017, Q2/2017, Q3/2016, Q4/2016	South Carolina Public Service Authority

*This data reflects the overall total generation from this facility during the designated quarter, and not necessarily the total amount that was sold into your state. Please contact the generator facility for specific information.

For information about the Green-e Energy certification program and its requirements, or to ask questions about how this letter is best used, see www.green-e.org/Energy or email us at verification@resource-solutions.org. The table above can be sent to you electronically upon request.

Sincerely,



Michael Leschke
Senior Manager, Certification Programs